

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KENNETH J. MOSS and	:	CHAPTER 13
NINETTE E. MOSS	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
KENNETH J. MOSS and	:	
NINETTE E. MOSS	:	
Respondents	:	CASE NO. 5-22-bk-01239

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 15th day of August, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

1. Debtors' plan violates 11 U.S.C. § 1322(a)(2) in that the debtors have not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507 – Claim #1.
2. Schedule D lacks description. (HUD not listed)
3. The Trustee avers that debtors' plan is not feasible based upon the following:
 - a. Secured claims not in plan – Claim #2 and #10.
4. The plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2D and 2G of the plan.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 22nd day of August, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Timothy Fisher, II, Esquire
P.O. Box 396
Gouldsboro, PA 18424

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee